

Appln No. 10/713,087  
Amdt. Dated September 27, 2004  
Response to Office action of July 22, 2004

4

### **REMARKS/ARGUMENTS**

The objections and submissions made by the Examiner in the Office Action have been carefully considered. Appropriate amendments have been introduced in the claims.

#### **Claim Objections**

The Examiner has objected to claim 1 on the basis that the printheads are not integers of the claim and, therefore, the "coefficient of thermal expansion" of the beam lacks antecedent. It is well established that claim limitations can be defined with reference to features in the claim preamble. Claim 1 defines "the" coefficient of thermal expansion of the beam on the basis that all solids have a coefficient of thermal expansion. Therefore, there is an inherent antecedent for this property of the beam. This property (the coefficient of thermal expansion) is then further defined by reference to the corresponding property of the printheads introduced in the preamble of the claim. This is a valid and often used claim structure. Nevertheless, claim 1 has been amended to clarify the definition of the functional limitations of the beam and the reference to the preamble.

#### **Claims Rejections**

In this section the Examiner has objected to claims 2 and 5-8 as including new matter and, therefore, not complying with the written description requirement. In particular, the Examiner alleges that the original specification does not support the limitation that "the combined lengths of adjacent segments define a pitch and the coefficient of thermal expansion across the pitch is substantially equal to that of a printhead carried by the pitch".

The Applicant contests the Examiner's conclusion on this issue. In the last paragraph of page 3 the specification discloses that "between any two of the mounting points of the printhead modules there is at least part of at least two of the segments such that the effective coefficient of thermal expansion of the support member between the points is substantially equal to the coefficient of thermal expansion of the substrate material". This disclosure, combined with Figure 2 that indicates that the space between the printhead modules is equal to the combined length of two adjacent segments, clearly directs the reader to the feature defined in the former claim 2. The combined disclosure also gives a sufficient support for the feature that the beam pitch and the printhead pitch are substantially the same.

Nevertheless, in the interest of an expeditious prosecution, the Applicant has amended claim 2 into closer alignment with the disclosure in the description.

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5

In light of the introduced amendments and the above discussions, it is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, reconsideration and allowance of the application is courteously solicited.

Very respectfully,

Applicant:



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